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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

May 14, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA,

v.

**JOSE FRANCISCO GARCIA-MARTINEZ,
a/k/a “Paco,”**

**JAMES MICHAEL BREWER,
a/k/a “Creeper,”**

**JONATHAN ALVARADO,
a/k/a “Joker,”**

**ENZO XAVIER DOMINGUEZ,
a/k/a “Smiley,”**

**ALEXIS DELGADO,
a/k/a “Chino,”**

**HECTOR LUIS LOPEZ,
a/k/a “Capulito,”**

**JOSE EDUARDO MORALES,
a/k/a “Primo,”**

**WILLIAM ALEXANDER LAZO,
a/k/a “Miclo,”**

KYLIE RAE ALVARADO,

RUBY MATA,

**MEXI DYAN GARCIA,
a/k/a “Mexi,”**

**ALFREDO GOMEZ,
a/k/a “Fredo,”**

**MARCOS RENE SIMAJ-GUCH,
a/k/a “Taco Man,”**

VICTOR NORRIS ELLISON, and

JESUS GOMEZ RODRIGUEZ

CRIMINAL NO. 4:25-cr-00245

INDICTMENT

18 U.S.C. § 2

18 U.S.C. § 922(g)

18 U.S.C. § 924(c)(1)(A)

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(B)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 841(b)(2)

21 U.S.C. § 846

21 U.S.C. § 952

21 U.S.C. § 960

FORFEITURE

[FILED UNDER SEAL]

a/k/a “JR.”

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE

Title 21, United States Code, § 846

Conspiracy to Possess with the Intent to Distribute and Distribute a Controlled Substance

Beginning on a date unknown to the Grand Jury, but from at least on or about April 1, 2022, and continuing until on or about the date of this indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, Defendants, **JOSE FRANCISCO GARCIA-MARTINEZ, a/k/a “Paco,” JAMES MICHAEL BREWER, a/k/a “Creeper,” JONATHAN ALVARADO, a/k/a “Joker,” ENZO XAVIER DOMINGUEZ, a/k/a “Smiley,” ALEXIS DELGADO, a/k/a “Chino,” HECTOR LUIS LOPEZ, a/k/a “Capulito,” JOSE EDUARDO MORALES, a/k/a “Primo,” WILLIAM ALEXANDER LAZO, a/k/a “Miclo,” KYLIE RAE ALVARADO, RUBY MATA, MEXI DYAN GARCIA, a/k/a “Mexi,” ALFREDO GOMEZ, a/k/a “Fredo,” MARCOS RENE SIMAJ-GUCH, a/k/a “Taco Man,” VICTOR NORRIS ELLISON, and JESUS GOMEZ RODRIGUEZ, a/k/a “JR.,”** did knowingly and intentionally conspire and agree with each other, and others known and unknown to the Grand Jury, to possess with intent to distribute and to distribute various controlled substances, including methamphetamine, its salts, isomers, and salts of its isomers; a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers; a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and

salts of isomers; a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”); and a mixture and substance containing a detectable amount of Oxycodone, all Schedule II controlled substances; a mixture and substance containing a detectable amount of heroin; a mixture and substance containing a detectable amount of marijuana; and a mixture and substance containing a detectable amount of psilocybin mushrooms, all Schedule I controlled substances; and a quantity of Alprazolam (“Xanax”), a Schedule IV controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

QUANTITY ATTRIBUTIONS

Methamphetamine

Defendants **JOSE FRANCISCO GARCIA-MARTINEZ, a/k/a “Paco,” JAMES MICHAEL BREWER, a/k/a “Creeper,” JONATHAN ALVARADO, a/k/a “Joker,” ENZO XAVIER DOMINGUEZ, a/k/a “Smiley,” ALEXIS DELGADO, a/k/a “Chino,” HECTOR LUIS LOPEZ, a/k/a “Capulito,” JOSE EDUARDO MORALES, a/k/a “Primo,” WILLIAM ALEXANDER LAZO, a/k/a “Miclo,” KYLIE RAE ALVARADO, RUBY MATA, MEXI DYAN GARCIA, a/k/a “Mexi,” and JESUS GOMEZ RODRIGUEZ, a/k/a “JR.,”** knew from their own conduct as members of the conspiracy charged in Count One, and from the readily foreseeable conduct of other members of that conspiracy, that the conspiracy involved a quantity of at least 50 grams of methamphetamine, its salts, isomers, and salts of its isomers, and at least 500 grams of a mixture and substance containing a detectable amount of methamphetamine and its salts, isomers, and salts of its isomers, both Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

Defendants **ALFREDO GOMEZ, a/k/a “Fredo,”** and **MARCOS RENE SIMAJ-GUCH, a/k/a “Taco Man,”** knew from their own conduct as members of the conspiracy charged in Count One, and from the readily foreseeable conduct of other members of that conspiracy, that the conspiracy involved a quantity of at least 5 grams of methamphetamine, its salts, isomers, and salts of its isomers, and at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii) .

Cocaine and Cocaine Base

Defendants **JOSE FRANCISCO GARCIA-MARTINEZ, a/k/a “Paco,”** **JAMES MICHAEL BREWER, a/k/a “Creeper,”** and **JONATHAN ALVARADO, a/k/a “Joker,”** knew from their own conduct as members of the conspiracy charged in Count One, and from the readily foreseeable conduct of other members of that conspiracy, that the conspiracy involved a quantity of at least 5 kilograms of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, and at least 280 grams of a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), both Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii) and (iii).

Defendants **ALEXIS DELGADO, a/k/a “Chino,”** **HECTOR LUIS LOPEZ, a/k/a “Capulito,”** **MEXI DYAN GARCIA, a/k/a “Mexi,”** and **VICTOR NORRIS ELLISON,** knew from their own conduct as members of the conspiracy charged in Count One, and from the readily foreseeable conduct of other members of that conspiracy, that the conspiracy involved a quantity of at least 500 grams of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, and at least 28 grams of a mixture and

substance containing a detectable amount of cocaine base (“crack cocaine”), both Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii) and (iii).

Heroin

Defendants **JAMES MICHAEL BREWER, a/k/a “Creeper,”** and **RUBY MATA,** knew from their own conduct as members of the conspiracy charged in Count One, and from the readily foreseeable conduct of other members of that conspiracy, that the conspiracy involved a quantity of at least 1 kilogram of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i).

COUNT TWO

Title 21, United States Code, Section 841(a)(1) **Possession with Intent to Distribute a Controlled Substance**

On or about November 10, 2022, in the Southern District of Texas, Defendants **WILLIAM ALEXANDER LAZO, a/k/a “Miclo,”** and **ALFREDO GOMEZ, a/k/a “Fredo,”** aided and abetted by one another, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of psilocybin mushrooms and a mixture and substance containing a detectable amount of marijuana, both Schedule I controlled substances; a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers; a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers; and salts of isomers, and a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), all Schedule II controlled substances; and a quantity of Alprazolam (“Xanax”) a Schedule IV controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and 841(b)(2) and Title 18, United States Code, Section 2.

COUNT THREE

Title 18, United States Code, Section 924(c)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about November 10, 2022, in the Southern District of Texas, Defendants **WILLIAM ALEXANDER LAZO, a/k/a “Miclo,”** and **ALFREDO GOMEZ, a/k/a “Fredo,”** aided and abetted by one another, and others known and unknown to the Grand Jury, did knowingly possess at least one firearm, to wit, an Anderson Manufacturing AM-15 rifle and a FN Herstal Five-Seven 5.7x28mm handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Two of this indictment,

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOUR

Title 18, United States Code, § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about November 10, 2022, in the Southern District of Texas, Defendant **ALFREDO GOMEZ, a/k/a “Fredo,”** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one firearm, to wit, an Anderson Manufacturing AM-15 rifle and a FN Herstal Five-Seven 5.7x28mm handgun, said firearm having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1).

COUNT FIVE

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about November 16, 2022, in the Southern District of Texas, Defendants **JAMES MICHAEL BREWER, a/k/a “Creeper,”** and **ALFREDO GOMEZ, a/k/a “Fredo,”** aided and abetted by one another, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of psilocybin mushrooms, and a mixture and substance containing a detectable amount of marijuana, both Schedule I controlled substances; at least 50 grams of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers; a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers; and a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), all Schedule II controlled substances; and a quantity of Alprazolam (“Xanax”), a Schedule IV controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and (b)(1)(C), and 841(b)(2) and Title 18, United States Code, Section 2.

COUNT SIX

Title 18, United States Code, Section 924(c)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about November 16, 2022, in the Southern District of Texas, Defendants **JAMES MICHAEL BREWER, a/k/a “Creeper”** and **ALFREDO GOMEZ, a/k/a “Fredo,”** aided and abetted by one another, and others known and unknown to the Grand Jury, did knowingly possess at least one firearm, to wit, an Anderson Manufacturing AM-15 rifle and a FN Herstal Five-Seven 5.7x28mm handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to

distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Five of this indictment,

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SEVEN

Title 18, United States Code, § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about November 16, 2022, in the Southern District of Texas, Defendant **ALFREDO GOMEZ, a/k/a “Fredo,”** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one firearm, to wit, an Anderson Manufacturing AM-15 rifle and a FN Herstal Five-Seven, 5.7x28mm handgun, said firearm having been shipped and transported in interstate and foreign commerce,

All in Violation of Title 18, United States Code, Section 922(g)(1).

COUNT EIGHT

Title 18, United States Code, § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about April 3, 2023, in the Southern District of Texas, Defendant **JONATHAN ALVARADO, a/k/a “Joker,”** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one firearm, to wit, a Century Arms International 1911 handgun, said firearm having been shipped and transported in interstate and foreign commerce,

All in Violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINE

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about June 28, 2023, in the Southern District of Texas, Defendant **RUBY MATA**, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute at least 50 grams of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance; and at least 100 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT TEN

Title 21, United States Code, Sections 952 and 960
Importation of a Controlled Substance

On or about June 28, 2023, in the Southern District of Texas, Defendant **RUBY MATA**, aided and abetted by others known and unknown to the Grand Jury, did intentionally and knowingly import into the United States, from the country of Mexico, at least 50 grams of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance; and at least 100 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance,

All in violation of Title 21, United States Code Sections 952(a), 960(b)(1)(H), and 960(b)(2)(A), and Title 18, United States Code, Section 2.

COUNT ELEVEN

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about September 27, 2023, in the Southern District of Texas, Defendant **JAMES MICHAEL BREWER, a/k/a “Creeper,”** did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, and a mixture and substance containing a detectable amount of psilocybin mushrooms, both Schedule I controlled substances,

All in violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(C).

COUNT TWELVE

Title 18, United States Code, Section 924(c)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about September 27, 2023, in the Southern District of Texas, Defendant **JAMES MICHAEL BREWER, a/k/a “Creeper,”** did knowingly possess at least one firearm, to wit, a Glock .40 caliber handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Eleven of this indictment,

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THIRTEEN

Title 18, United States Code, § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about September 27, 2023, in the Southern District of Texas, Defendant **JAMES MICHAEL BREWER, a/k/a “Creeper,”** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one firearm, to wit, a .40 caliber Glock handgun, said firearm having been shipped and transported in interstate and foreign commerce,

All in Violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOURTEEN

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about November 15, 2023, in the Southern District of Texas, Defendants **JOSE FRANCISCO GARCIA-MARTINEZ, a/k/a “Paco,” ENZO XAVIER DOMINGUEZ, a/k/a “Smiley,”** and **KYLIE RAE ALVARADO,** aided and abetted by one another, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute, and did distribute, at least 5 grams of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

Between on or about December 10, 2023, and on or about December 11, 2023, in the Southern District of Texas, Defendants **JOSE FRANCISCO GARCIA-MARTINEZ, a/k/a “Paco,” ENZO XAVIER DOMINGUEZ, a/k/a “Smiley”** and **KYLIE RAE ALVARADO**, aided and abetted by one another, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute, and did distribute, at least 50 grams of methamphetamine, its salts, isomers, and salts of its isomers, and a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, both Schedule II controlled substances,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIXTEEN

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about January 18, 2024, in the Southern District of Texas, Defendants **JOSE FRANCISCO GARCIA-MARTINEZ, a/k/a “Paco,” ENZO XAVIER DOMINGUEZ, a/k/a “Smiley,”** and **KYLIE RAE ALVARADO**, aided and abetted by one another, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute and did distribute at least 5 grams of methamphetamine, its salts, isomers, and salts of its isomers, and a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, both Schedule II controlled substances,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

Between on or about February 27, 2024, and on or about February 28, 2024, in the Southern District of Texas, Defendants **JOSE FRANCISCO GARCIA-MARTINEZ, a/k/a “Paco,” ENZO XAVIER DOMINGUEZ, a/k/a “Smiley,” JOSE EDUARDO MORALES, a/k/a “Primo,” WILLIAM ALEXANDER LAZO, a/k/a “Miclo,” and KYLIE RAE ALVARADO,** aided and abetted by one another and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute, and did distribute, at least 50 grams of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

Between on or about May 11, 2024, and on or about May 14, 2024, in the Southern District of Texas, Defendants **JAMES MICHAEL BREWER, a/k/a “Creeper,” ALEXIS DELGADO, a/k/a “Chino,” HECTOR LUIS LOPEZ, a/k/a “Capulito,” and MEXI DYAN GARCIA, a/k/a “Mexi,”** aided and abetted by one another and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute, and did distribute, at least 50 grams of methamphetamine, its salts, isomers, and salts of its isomers; a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers; and at least 28 grams of a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), all Schedule II controlled substances,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINETEEN

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about June 5, 2024, in the Southern District of Texas, Defendant **MARCOS RENE SIMAJ-GUCH, a/k/a “Taco Man,”** aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute, and did distribute, a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2

COUNT TWENTY

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about July 3, 2024, in the Southern District of Texas, Defendant **JONATHAN ALVARADO, a.k.a. “Joker,”** did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance; and a mixture and substance containing a detectable amount of Alprazolam, a Schedule IV controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(2).

COUNT TWENTY-ONE

Title 18, United States Code, Section 924(c)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about July 3, 2024, in the Southern District of Texas, Defendant **JONATHAN ALVARADO, a.k.a. “Joker,”** did knowingly possess at least one firearm, to wit,

- a. Glock 19 9 mm handgun,
- b. Glock 17 9 mm handgun,
- c. FN Herstal Five-Seven, 5.7 x 28 caliber handgun, and
- d. Century Arms, Inc., 7.62 x 39 mm Micro Draco pistol,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Twenty of this indictment,

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT TWENTY-TWO

Title 18, United States Code, § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about July 3, 2024, in the Southern District of Texas, Defendant, **JONATHAN ALVARADO, a.k.a. “Joker,”** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one firearm, to wit,

- a. Glock 19 9 mm handgun,
- b. Glock 17 9 mm handgun,
- c. FN Herstal Five-Seven, 5.7 x 28 caliber handgun, and
- d. Century Arms, Inc., 7.62 x 39 mm Micro Draco pistol,

said firearm having been shipped and transported in interstate and foreign commerce,

All in violation of Title 18, United States Code, Sections 922(g)(1).

COUNT TWENTY-THREE

Title 18, United States Code, Section 924(c)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about August 2, 2024, in the Southern District of Texas, Defendant **ALEXIS DELGADO, a/k/a “Chino,”** did knowingly possess at least a firearm, to wit, a Century Arms, Inc., 7.62 x 39mm Micro Draco in furtherance of a drug trafficking crime for which he may be

prosecuted in a court of the United States, namely knowingly and intentionally conspiring to possess with intent to distribute and distribute controlled substances, in violation of 21 U.S.C. §§ 841(a)(1), 846, as charged in Count One,

All in violation of Title 18, United States Code, Sections 924(c)(1)(A).

COUNT TWENTY-FOUR

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about August 29, 2024, in the Southern District of Texas, Defendants **ALEXIS DELGADO, a/k/a “Chino,”** and **JESUS GOMEZ RODRIGUEZ a/k/a “JR,”** aided and abetted by one another and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute, and did distribute, at least 50 grams of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

Title 21, United States Code, Section 841(a)(1)
Possession with Intent to Distribute a Controlled Substance

On or about December 19, 2024, in the Southern District of Texas, Defendants **JAMES MICHAEL BREWER, a/k/a “Creeper,”** **ALEXIS DELGADO, a/k/a “Chino,”** and **VICTOR NORRIS ELLISON,** aided and abetted by one another and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute and did distribute a mixture and substance containing a detectable amount of marijuana, Schedule I Controlled Substances; at least 500 grams of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, and a detectable amount

of Oxycodone, both Schedule II controlled substances; and a quantity of Alprazolam (“Xanax”), a Schedule IV controlled substance,

All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), 841(b)(2) and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX

Title 18, United States Code, Section 924(c)
Possession of a Firearm in Furtherance of a Drug Trafficking Crime

On or about December 19, 2024, in the Southern District of Texas, Defendants **JAMES MICHAEL BREWER, a/k/a “Creeper,” ALEXIS DELGADO, a/k/a “Chino,”** and **VICTOR NORRIS ELLISON**, aided and abetted by one another and others known and unknown to the Grand Jury, did knowingly possess at least one firearm, to wit,

- a. Century Arms, Inc., 7.62x39mm Micro Draco pistol,
- b. Glock 43 9mm handgun,
- c. 9mm handgun with no make or model, with serial number
- d. Colt MKII 0.38 special revolver,
- g. S&W Model 637 0.38 caliber special revolver, and
- h. F.lli Pietta 0.44 caliber revolver,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely knowingly and intentionally possessing with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Twenty-Five of this indictment,

All in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT TWENTY-SEVEN

Title 18, United States Code, § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about December 19, 2024, in the Southern District of Texas, Defendant **JAMES**

MICHAEL BREWER, a/k/a “Creeper,” knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one firearm, to wit,

- a. Century Arms, Inc., 7.62x39mm Micro Draco pistol,
- b. Glock 43 9mm handgun,
- c. 9mm handgun with no make or model, with serial number
- d. Colt MKII 0.38 special revolver,
- g. S&W Model 637 0.38 caliber special revolver, and
- h. Flli Pietta 0.44 caliber revolver,

said firearm having been shipped and transported in interstate and foreign commerce,

All in Violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-EIGHT

Title 18, United States Code, § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about December 19, 2024, in the Southern District of Texas, Defendant **VICTOR NORRIS ELLISON**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one firearm, to wit,

- a. Century Arms, Inc., 7.62x39mm Micro Draco pistol,
- b. Glock 43 9mm handgun,
- c. 9mm handgun with no make or model, with serial number
- d. Colt MKII 0.38 special revolver,
- g. S&W Model 637 0.38 caliber special revolver, and
- h. Flli Pietta 0.44 caliber revolver,

said firearm having been shipped and transported in interstate and foreign commerce,

All in Violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-NINE

Title 18, United States Code, § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about March 22, 2025, in the Southern District of Texas, Defendant **HECTOR LOPEZ, a/k/a “Capulito,”** knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit, a Smith & Wesson 380 handgun, said firearm having been shipped and transported in interstate and foreign commerce,

All in Violation of Title 18, United States Code, Section 922 (g)(1).

NOTICE OF CRIMINAL FORFEITURE

Title 21, United States Code, Section 853(a)

Pursuant to Title 21, United States Code, Section 853(a), as a result of the commission of a violation of Title 21, United States Code, Sections 846 and 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and 841(b)(1)(C), as alleged in Counts One, Two, Five, Nine, Eleven, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty and Twenty-Five of the Indictment, notice is given to the Defendants,

**JOSE FRANCISCO GARCIA-MARTINEZ,
a/k/a “Paco,”**

**JAMES MICHAEL BREWER,
a/k/a “Creeper,”**

**JONATHAN ALVARADO,
a/k/a “Joker,”**

**ENZO XAVIER DOMINGUEZ,
a/k/a “Smiley,”**

**ALEXIS DELGADO,
a/k/a “Chino,”**

**HECTOR LUIS LOPEZ,
a/k/a “Capulito,”**

**JOSE EDUARDO MORALES,
a/k/a “Primo,”**

**WILLIAM ALEXANDER LAZO,
a/k/a “Miclo,”**

KYLIE RAE ALVARADO,

RUBY MATA,

**MEXI DYAN GARCIA,
a/k/a “Mexi,”**

**ALFREDO GOMEZ,
a/k/a “Fredo,”**

**MARCOS RENE SIMAJ-GUCH,
a/k/a “Taco Man,”**

VICTOR NORRIS ELLISON, and

**JESUS GOMEZ RODRIGUEZ
a/k/a “JR.”**

that the following is subject to forfeiture: (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and (2) all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation. The allegations contained in Counts One, Two, Five, Nine, Eleven, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty and Twenty-Five of this Indictment are realleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

**Title 18, United States Code, Section 924(d) and
Title 28, United States Code, Section 2461(c)**

Pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), as a result of the commission of a violation of Title 18, United States Code, Sections 922 and 924 as alleged in Counts Three, Four, Six, Seven, Eight, Twelve, Thirteen, Twenty-One, Twenty-Two, Twenty-Three, Twenty-Six, Twenty-Seven, Twenty-Eight and Twenty-Nine of the Indictment, notice is given to the Defendants,

**JAMES MICHAEL BREWER,
a/k/a “Creeper,”**

**JONATHAN ALVARADO,
a/k/a “Joker,”**

**ALEXIS DELGADO,
a/k/a “Chino,”**

**HECTOR LUIS LOPEZ,
a/k/a “Capulito,”**

**WILLIAM ALEXANDER LAZO,
a/k/a “Miclo,”**

**ALFREDO GOMEZ, and
a/k/a “Fredo,”**

VICTOR NORRIS ELLISON,

that all firearms and ammunition involved in or used in the commission of such violations are subject to forfeiture. The allegations contained in Counts Three, Four, Six, Seven, Eight, Twelve, Thirteen, Twenty-One, Twenty-Two, Twenty-Three, Twenty-Six, Twenty-Seven, Twenty-Eight and Twenty-Nine are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of the firearms offenses alleged in these Counts, each Defendant shall forfeit to the United States such property including, but not limited to:

- A) Anderson Manufacturing AM-15 rifle, bearing serial number 21406737,
- B) FN Herstal Five-Seven, 5.7 x 28 caliber handgun, bearing serial number 386409266,
- C) FN Herstal Five-Seven, 5.7 x 28 caliber handgun, bearing serial number 386444095,
- D) Century Arms International 1911 handgun, bearing serial number M451391,
- E) Glock .40 caliber handgun, bearing serial number BVVP355,
- F) Glock 19 9 mm handgun, bearing serial number BFSF033,
- G) Glock 17 9 mm handgun, bearing serial number BEAV809,
- H) Century Arms, Inc., 7.62 x 39 mm Micro Draco pistol, bearing serial number PMD-22120-20 ROA,

- I) Century Arms, Inc., 7.62x39mm Micro Draco pistol, bearing serial number ROA 21-PMD-27596,
- J) Glock 43 9mm handgun, bearing serial number BCYZ900,
- K) 9mm handgun with no make or model, bearing serial number JJE64461,
- L) Colt MKII 0.38 special revolver, bearing serial number J15172,
- M) S&W Model 637 0.38 caliber special revolver, bearing no serial number,
- N) Flli Pietta 0.44 caliber revolver, bearing serial number 461569, and
- O) Smith & Wesson 380 handgun, bearing serial number KHL2744

all in accordance with Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853; Title 28, United States Code, Section 2461(c); and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

MONEY JUDGMENT

Defendants are notified that, upon conviction, a monetary judgment may be imposed equal to the total value of the property subject to forfeiture and proceeds obtained, directly or indirectly, as a result of each defendant's participation in the offenses.

SUBSTITUTE ASSETS

Defendants are notified that in the event that property subject to forfeiture, as a result of any act or omission any defendant,

- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred or sold to, or deposited with, a third party;
- (C) has been placed beyond the jurisdiction of the court;
- (D) has been substantially diminished in value; or

(E) has been commingled with other property that cannot be divided without difficulty, it is the intent of the United States to seek forfeiture of any other property of the defendant up to the total value of such property pursuant to Title 21, United States Code, Section 853(p), incorporated by reference in Title 28, United States Code, Section 2461(c).

A TRUE BILL

Original Signature on File

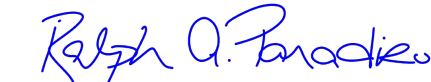
GRAND JURY FOREPERSON

NICHOLAS J. GANJEI
United States Attorney
Southern District of Texas


FRANCISCO RODRIGUEZ

Assistant United States Attorney

DAVID L. JAFFE
Chief, Violent Crime and Racketeering Section
United States Department of Justice


RALPH PARADISO

AMANDA KOTULA

Trial Attorney

United States Department of Justice

Violent Crime and Racketeering Section